

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

MANIYA ALLEN; LETRIYSA ALEXIS;
DAVEON ARCHIBOLD; DAMIAN ARIAS;
KWAMAINE BARLOW; KENNEDY
BLAND; TYRON BRAZIL; LASHARIA
BROOM; NAQUINDA BROOM;
MERCEDES BROWN; PORSCHA BROWN;
TERRANCE BROWN; TEVIN BROWN;
TEVINE BROWN; SHATEIVIA BRUCE;
BRANDON BULLOCK; LATONYA
CANNON; HAZEL CARABAJAL; ANJUAN
COLEMAN; JADAH CONNER; IAN
COOPER; DELANEO CRAIG; JOY CRAIG;
LUIS CURET; XAVIER CURRIE;
DIAMOND DAVIDSON; LEAH DAVIS;
DOMINIQUE DAVIS ; FELTON DODD ;
RIO DURAN; GRAI DURRAH; ARLEATHA
EVANS; GARQWAIN EVANS;
GEONANDRE EVANS; JAMECIA EVANS;
JAVION EVANS; CHASIDY FARMER;
MIKEL FAYNE;NIGEL FAYNE;
SHAMARRA FERGUSON; DE'MARIO
FLEMING; CHARLES FORD, JR.; ISAIAH
FRIEMOTH; CHESS GOODMAN, JR.;
CHARLIA GRANT; KEVIN HALL;
VANLISHA HAMMOND; JOMARA
HARDISON; LATOYA HARRIS; DONTA
HARVEY; AMBER HAUGEN-SCHMITT;
JOSHUA HAUGEN-SCHMITT;
ADRIANNA HEDWOOD; ARIEYANA
HEDWOOD; ADRAIN HENDRIX;
ANTHONY HENDRIX; RAUL
HERNANDEZ, JR.; DESHAWN HEWINGS;
SAVANNA HEWINGS;AMBREA HOLDER;
KAYLA HOLLINS; LAQUISHA HOUSE;
CELISA HOUSTON; MAHOGANY
HUGES- HINTON; EARL DREANA
HUGHES;
EDWARD HUGHES; TE' DREANA

THIRD AMENDED COMPLAINT

Case No. 11-C-55

HUGHES; A'NYA HUMPHRIES; FAITH
ITSALEUMSACK; JADA JAMISON;
BRITTANY JEFFERSON; LEROY
JENNINGS; ANTHONY JOHNSON;
KEITH JOHNSON; BRANDON
JOHNSON; QUA-SHAWN
JONES; RANESHA KEYES;
ANIYAH KIMBLE; JAVONTE KING;
MOET KNOWLES; DEJONE LAMPKIN;
CARMALE LEE; DONTREL LEE;
DONZEL LEE; ADAM LEEK;
CAMONIE LEWIS; EMAURIEON
LEWIS; ORZELL LONG; CRYESSE
LEWIS; NIGERIA LOVE; ASHLEY
MALONE; KALEEL MCCRAY-CLARK;
KIMANZI MCCRAY- CLARK; TYANN
MCHENRY; YAHYNEZ MCHENRY;
JEREMY MCKINNEY; ESSENCE
MCKINNIE; DESHAYLA MILTON;
MAKAELIA MISSOURI; MARSHREE
MISSOURI; CHANTE MITCHELL;
MARQUISE MITCHELL; JYAIRES
MURPHY; DEMOND'DRE MYERS;
CHRISTOPHER NASH; MARYEASHA
NEWSOME; DENVER NITSCH; KEITH
NORRINGTON; BENITA OATIS; TITUS
OWENS; SIEANA PLEESTER;
KATHLEEN RIMMER; KHADEDRA
RIMMER; SHAROD RIMMER;
SHYRELLE RIMMER; TIEANNA
RIMMER; MARTEZ RODGERS; JACOB
RUEDINGER; JAMARA RUFFIN;
PERRION RUFFIN; TAILYIAH RUSH;
CODY SCHWOCH; MARSHIA SCOTT;
QUINCY SCOTT; SANTANA SCOTT;
TALIYAH SCOTT; TARAYIA SCOTT;
MAURICE SLOAN, JR.; SAMMIE
SMITH; SHAMAR SMITH; SHELIYAH
SMITH; SHERELLE SMITH; SHMYAH
SMITH; SEDAN SMITH; IYESHA
SOUTHERN; BRIAN STEWART;
DESTINY STOKES; DAWSON
TAYLOR; GERALD, III TENNANT;
BRIAN THOMAS; CAMARION
THOMAS; ANTHONY THOMPSON;
D'ANGELO THOMPSON; DESTINY
THOMPSON; SYNGEON TURNER;

QUENTELLA WALKER; TERIONTAE
WALKER; TINA WEATHERSPOON;
DANIEL WHELESS; RANDALL
WHITMORE; SINQUASHA
WHITMORE; JERRELL WILLIAMS;
JIM-MYA WILLIAMS; MAKAYLA
WILLIAMS; TYVONI WILLIAMS;
JAQUAIVIA WILLIS; AND BRIANA
ZARATE;

Plaintiffs,

vs.

AMERICAN CYANAMID CO.; ARMSTRONG
CONTAINERS, INC.; E.I. DUPONT DENEMOURS
& COMPANY; THE ATLANTIC RICHFIELD
COMPANY; and THE SHERWIN-WILLIAMS
COMPANY.

Defendants.

I. PARTIES

Now come the above-named Plaintiffs, by their attorneys, for a cause of action against the above- named defendants, and allege and show to the Court as follows:

I. PARTIES

1. Each of the Plaintiffs join in this action pursuant to Rule 20 (a)(1) of the Federal Rules of Civil Procedure asserting their rights to relief arising out of the same series of transactions and occurrences and said rights to relief giving rise to numerous common questions of law and fact as alleged below, and invoke the jurisdiction of the Court pursuant to 28 U.S.C. § 1332.
2. Letriysa Alexis was a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 3507 Queen Avenue N Minneapolis MN. Plaintiff is a citizen of the State of Minnesota. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2648 North 2nd Street; 2238 North 5th Street) , which contained surfaces which were coated with paint

containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 37 on 8/31/1994.

3. Maniya Allen is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 2461 West Monroe Street Milwaukee WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (4658 North Hopkins Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 34 on 7/24/2003.

4. Daveon Archibald was a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 8105 West Hampton, #4 Milwaukee WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (3954 North 72nd Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead

carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 20 on 1/28/2002.

5. Damian Arias was a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 25 East 193rd Street Bronx NY. Plaintiff is a citizen of the State of New York. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (1126 South 11th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 34 on 2/22/1999.

6. Kwamaine Barlow is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 1320 N 43rd Street Milwaukee WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (1320 North 43rd Street, Apt.), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 28 on 8/4/2003.

7. Kennedy Bland is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 3741 North 24th Place Milwaukee WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (3741 North 24th Place), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 26 on 7/27/2005.

8. Tyron Brazil was a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 4877 North 55th Street Milwaukee WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2524 North 32nd Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 44 on 6/8/1994.

9. Lasharia Broom is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 2606 North 18th Street Milwaukee WI. Plaintiff is a citizen of the State of Wisconsin.

Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2604 North 18th Street, Apt 5, 1300 West Wright Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 27 on 9/1/2005.

10. Naquinda Broom is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 2606 North 18th Street Milwaukee WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2604 North 18th Street, Apt 5, 1300 West Wright Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 13 on 8/14/2006.

11. Mercedes Brown was a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 2233 North 6th Street Milwaukee WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2455 North 5th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the

Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 15 on 9/5/1997.

12. Porscha Brown was a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 2233 North 6th St., Milwaukee WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2455 North 5th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 20 on 4/27/2001.

13. Terrance Brown was a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 3052A North 26th Street, Milwaukee WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2403 North 20th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning

caused a peak elevated blood lead level of 24 on 7/25/1995.

14. Tevin Brown was a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 2442 North 28th Street, Milwaukee WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2525 North 44th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 24 on 9/8/1995.

15. Tevine Brown was a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 2442 North 28th Street, Milwaukee WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2525 North 44th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 58 on 4/28/1999.

16. Shateivia Bruce is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was

domiciled at 602 West Center Street, Milwaukee WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (602 West Center Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 20 on 8/12/2005.

17. Brandon Bullock was a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 3234 North 24th Street, Milwaukee WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (1531 North 29th Street, 3121 Buffum Street, 3253 North 24th Street, 3540 North 20th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 52 on 8/11/1998.

18. Latonya Cannon was a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 3822 N. 16th Street, Milwaukee, WI, and on January 19, 2011, was domiciled at 3030 N. 21St Street, Milwaukee, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the

residence(s) in Milwaukee, Wisconsin (2962 North 18th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 84 on 6/2/1994.

19. Hazel Carabajal is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 2072 South 35th Street, Milwaukee WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2072 S 35th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 33 on 8/17/2005.

20. Anjuan Coleman is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 1109 West Keefe Avenue, Milwaukee WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2477 North 44th Street, 1109 West Keefe Avenue), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted,

supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 85 on 7/28/2005.

21. Jadah Conner is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 2741 North 45th Street, Milwaukee WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2741 N 45th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 32 on 7/1/03.

22. Ian Cooper was a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 2479 North 69th Street, Milwaukee WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (3342 North 26th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning

caused a peak elevated blood lead level of 31 on 7/19/1999.

23. Delaneo Craig was a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 2821 North Hubbard Street, Milwaukee WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (1720 North 37th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 22 on 11/17/2003.

24. Joy Craig was a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 2821 North Hubbard Street, Milwaukee WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (1905 West Chambers Street, 1313 West Cherry Street, 1547 North 35th Street, 2821 North Hubbard), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 18 on 8/12/1999.

25. Luis Curet was a minor and was a resident of the State of Wisconsin at all times material

to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 1813 South 19th Street, Milwaukee WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (1813 South 19th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 34 on 0/0/1999.

26. Xavier Currie was a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 6138 West Port Avenue, Milwaukee, WI, and on January 19, 2011, was domiciled at 5800 North 91st Street, Apt. #4, Milwaukee, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (4132 North 24th Place; and 2448 North 39th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 53 on 7/28/1999.

27. Diamond Davidson is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 4879 North 19th Street, Milwaukee WI. Plaintiff is a citizen of the State of

Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 33 on 5/3/2004.

(4879 North 19th Street), which contained surfaces which were coated with paint containing

28. Leah Davis is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 3365 North 21st Street, Milwaukee, WI, and on January 19, 2011, was domiciled at 3356 North 21st Street, Milwaukee, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (3356 North 21st Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 22 on 6/29/2005.

29. Dominique Davis was a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 3507 Queen Avenue N Minneapolis MN. Plaintiff is a citizen of the State of Minnesota. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2648 North 2nd Street, 2238 North 5th Street, 3918 North 29th Street), which contained surfaces which were

coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 20 on 8/8/1994.

30. Felton Dodd was a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 4126A. Burleigh Street, Milwaukee WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (1610 North 35th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 53 on 8/4/1993.

31. Rio Duran is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 2829 North 50th Street, Milwaukee WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2829 North 50th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed

to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 23 on 8/18/2005.

32. Grai Durrah was a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 3417 North 4th Street, Milwaukee WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2205 North 37th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 22 on 7/22/1998.

33. Arleatha Evans is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 2455 West Medford Street, Milwaukee WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2114 North 36th Street, 2341 North 14th Street, 2455 West Medford Avenue), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 22

on 7/22/2003.

34. Garqwain Evans is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 3215 North 20th Street, Milwaukee WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (3241 North 34th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 52 on 5/3/2005.

35. Geonandre Evans is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 3215 North 20th Street, Milwaukee WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (3241 North 34th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 25 on 5/3/2005.

36. Jamecia Evans was a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011,

was domiciled at 2455 West Medford Street, Milwaukee WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2600 West Walnut Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 17 on 10/6/1995.

37. Javion Evans is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 2455 West Medford Street, Milwaukee WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2455 West Medford Avenue), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 16 on 1/11/2006.

38. Chasidy Farmer was a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 2618 North 28th Street, Milwaukee WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (219 E. Burleigh Street, 2879 North 29th Street), which contained surfaces which were coated with paint

containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 71 on 3/15/1996.

39. Mikel Fayne is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 3412 West Rohr Avenue, Milwaukee WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2832 West Wisconsin Avenue), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 12 on 12/21/2001.

40. Nigel Fayne was a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 3412 West Rohr Avenue, Milwaukee WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2832 West Wisconsin Avenue), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the

Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments.

Said lead poisoning caused a peak elevated blood lead level of 20 on 9/15/1995.

41. Shamarra Ferguson was a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 6442 North 106th Street, #3, Milwaukee WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2659 North 41st Street, 5046 North 84th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 44 on 3/18/1997.

42. De'Mario Fleming was a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 414 East Concordia Street, Upper Apt., Milwaukee WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (414 E. Concordia Avenue), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 26 on 4/6/2005.

43. Charles Ford, Jr. is a minor and was a resident of the State of Wisconsin at all times

material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 2726 West Melvina Street, Milwaukee WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2726 West Melvina Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 18 on 7/26/2007.

44. Isaiah Friemoth is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 426 South Quincy Street, Apt. 4, Green Bay, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Green Bay, Wisconsin (961 Velp Ave, 1740 Western Ave), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 52 on 3/31/2005.

45. Chess Goodman, Jr. was a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 414 East Concordia Street, Upper Apt., Milwaukee, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin

(2125 North 38th Street, 2558 North Buffum Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 13 on 9/20/1999.

46. Charlia Grant is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 2921 North 6th Street, Milwaukee WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2921 North 6th Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 24 on 3/7/2005.

47. Kevin Hall was a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 2821 North Hubbard Street, Milwaukee WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2013 North 32nd Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the

Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 33 on 8/10/1999.

48. Vanlisha Hammond was a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 2409 West Lloyd Street, Milwaukee WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (3222 North 12th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 33 on 6/23/1993.

49. Jomara Hardison was a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 6330 West Florist Avenue, Milwaukee WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (3039 North Buffum Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 78 on 8/4/1995.

50. Latoya Harris was a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 2474 North 39th Street, Milwaukee WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (3904 North Port Washington Avenue, 2329 North 44th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 49 on 9/6/1995.

51. Donta Harvey was a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 2233 North 6th Street, Milwaukee WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2455 North 5th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 27 on 10/15/2002.

52. Amber Haugen-Schmitt is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 1247A South 15th Street, Milwaukee, WI. Plaintiff is a citizen of the

State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (1247 South 15th Street, Apt. A), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 32 on 10/19/04 & 1/19/05.

53. Joshua Haugen-Schmitt is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 1247A South 15th Street, Milwaukee WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin(1247 South 15th Street, Apt. A), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 39 on 1/10/2006.

54. Adrianna Hedwood is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 5306 North 35th Street, Milwaukee WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (5306 North 35th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed

and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 17 on 8/5/2005.

55. Arieyana Hedwood is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 5306 North 35th Street, Milwaukee WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (5306 North 35th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 31 on 8/3/2005.

56. Adrain Hendrix was a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 516 Lime Kiln Road, Green Bay, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2664 North 20th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning

caused a peak elevated blood lead level of 35 on 10/17/1996.

57. Anthony Hendrix was a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 516 Lime Kiln Road, Green Bay, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2664 North 20th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 35 on 7/13/1995.

58. Raul Hernandez, Jr. is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 3013 S 15th Place, Milwaukee WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2255 South 16th Street, 2004 South 16th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 31 on 10/7/2003.

59. Deshawn Hewings was a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011,

was domiciled at 714 West Summer Street, Apt. 450, Milwaukee WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2561A North 14th Street, 2561 North 14th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 50 on 7/10/1995.

60. Savanna Hewings was a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 714 West Summer Street, Apt. 450, Milwaukee WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2561 North 14th Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 12 on 8/2/1999.

61. Ambrea Holder was a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 6450 North 45th Street, Milwaukee, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2767 North

8th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 25 on 5/23/1995.

62. Kayla Hollins is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 1917 North 7th Street, Milwaukee, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2133 North 47th Street, 2614 North 46th Street, 2319 North 5th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 34 on 9/10/2002.

63. Laquisha House was a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 917 South 25th Street, Milwaukee, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (1537 South 12th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed

and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 33 on 6/27/2002.

64. Celisa Houston is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 1333 North 24th Place, Milwaukee, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (1333 North 24th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 22 on 7/22/2005.

65. Mahogany Hughes-Hinton was a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 4616 West Rice Street, Milwaukee, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (4945 West Medford Avenue), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said

lead poisoning caused a peak elevated blood lead level of 50 on 10/19/1996.

66. Earldreana Hughes is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 414 East Concordia Street, Upper Apt., Milwaukee, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (414 E. Concordia Avenue), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 19 on 11/14/2005.

67. Edward Hughes was a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 414 East Concordia Street, Upper Apt., Milwaukee, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (414 E. Concordia Avenue), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 13 on 2/3/2005.

68. Te' Dreana Hughes is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011,

was domiciled at 414 East Concordia Street, Upper Apt., Milwaukee, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (414 E. Concordia Avenue), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 13 on 2/1/2005.

69. A'nya Humphries is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 3132 West National Avenue, Milwaukee WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (3132 West National Avenue), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 25 on 7/18/2005.

70. Faith Itsaleumsack is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 24455 9th Place, Milwaukee WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (1539 South 15th Street, 2445 South 9th Place), which contained surfaces which were coated with paint containing white

lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 44 on 9/6/2003.

71. Jada Jamison was a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 6450 North 45th Street, Milwaukee, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2767 North 8th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 25 on 8/24/1995.

72. Brittany Jefferson was a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 3412 West Rohr Avenue, Milwaukee, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2832 West Wisconsin Avenue), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff

continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 21 on 7/21/1994.

73. Leroy Jennings was a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 2924 Arcadia Terrace, Rockford, IL. Plaintiff is a citizen of the State of Illinois. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2817 North 2nd Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 71 on 5/28/1993.

74. Anthony Johnson is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 1823 South 23rd Street, #1, Milwaukee, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (1921 South 19th Street, 1320 South 25th Street, 1832 South 23rd Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 22 on 8/16/2005.

75. Keith Johnson is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 1826 North 39th Street, Milwaukee, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (1862 North 39th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 21 on 6/30/2003.

76. Brandon Johnson was a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 2820 W. Wells St., Apt. 203, Milwaukee, WI, and on January 19, 2011, was domiciled at 3346 North 17th Street, Milwaukee, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2661 N. 48th Street; and 3123 North 41st Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 90 on 6/23/1994.

77. Qua-Shawn Jones is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011,

was domiciled at 1908 Hillcrest Avenue Rockford IL. Plaintiff is a citizen of the State of Illinois. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (502 North 32nd Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 40 on 5/19/2004.

78. Ranesha Keyes was a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 3052 North 9th Street, Milwaukee, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2722 North 34th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 39 on 5/11/1999.

79. Aniyah Kimble is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 3724-A North 5th Street, Milwaukee, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (3724 A North 5th Street), which contained surfaces which were coated with paint containing white lead

carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 28 on 10/14/2002.

80. Javonte King is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 4934 North 73rd Street, Milwaukee, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (3328 North 26th St 3357 North 20th St), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 18 on 4/27/2004.

81. Moet Knowles is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 2641 North 25th Street, Milwaukee, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2434 North 53rd Street, A), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff

continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 31 on 8/28/2003.

82. Dejone Lampkin is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 3203A North 16th Street, Milwaukee, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2663 North Martin Luther King Drive), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 40 on 4/12/2004.

83. Carmale Lee is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 3231 North 24th Place, Milwaukee, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (3231 North 24th Place, 3239 North 24th Place, 3321 North 12th Street, A), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 22 on 7/29/2004.

84. Dontrel Lee is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 1931 North 37th Street, Milwaukee, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (1931 North 37th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 40 on 8/11/2005.

85. Donzel Lee is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 1931 North 37th Street, Milwaukee, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (1931 North 37th Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 45 on 7/21/2006.

86. Adam Leek was a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 2009 Conner Road Hampton VA. Plaintiff is a citizen of the State of Virginia.

Plaintiff previously occupied the residence(s) in LaCrosse, Wisconsin (1352 Liberty Street, LaCrosse, Wisconsin), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 45 on 6/10/2000.

87. Camonie Lewis is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 3457 North 13th Street, Milwaukee, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (3457 North 13th Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 61 on 8/3/2007.

88. Emaurieon Lewis is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 3068 North 44th Street, Milwaukee, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (5523 North 37th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed

and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 24 on Jun-05.

89. Orzell Long is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 2821 North Hubbard Street, Milwaukee WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (1720 North 37th St, 2821 North Hubbard Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 22 on 4/6/2005.

90. Tyrese Lewis is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 2114 16th Street, Racine, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Racine, Wisconsin (710 Kewaunee Street, Racine WI), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak

elevated blood lead level of 37 on 3/1/2008.

91. Nigeria Love was a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 3412 West Rohr Avenue, Milwaukee, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2832 West Wisconsin Avenue), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 36 on 7/28/1998.

92. Ashley Malone is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 2737 North 23rd Street, Milwaukee, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (1119 Keefe Ave, 8005 West Bender Avenue, 9426 West Sheridan Ave, 6460 North 69th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 12 on 11/1/1994.

93. Kaleel McCray-Clark is a minor and was a resident of the State of Wisconsin at all times

material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 5121 North 53rd Street, Milwaukee WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2429 West Nash Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 77 on 7/21/2005.

94. Kimanzi McCray-Clark was a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 5121 North 53rd Street, Milwaukee, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2429 West Nash Street, 3937 North 23rd Street, 2119 North 35th Street, 3423 North 5th Street Apt. C), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 45 on 7/27/2005.

95. Tyann McHenry was a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 2462 North Hubbard Street, Milwaukee, WI, and on January 19, 2011, was domiciled at 317 East Chambers Street, Upper

Floor, Milwaukee, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2815 North 34th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 26 on 4/26/2000.

96. Yahynez McHenry is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 2128 North 41st Street, Milwaukee, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2815 North 34th Street, 2128 North 41st Street, 2627 North 36th Street, 2618 North 41st Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 32 on 10/17/2002.

97. Jeremy McKinney was a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 4424 North 63rd Street, Milwaukee, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2539 North

Holton Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 44 on 10/5/1999.

98. Essence McKinnie is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 2477 West Auer Avenue, Milwaukee, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2477 West Auer Avenue), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 30 on 8/30/2004.

99. DeShayla Milton was a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 2133 North 47th Street, Milwaukee, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2326 North 12th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the

Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 47 on 3/30/2005.

100. Gabriel Miranda is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 150 A. South 23rd Street, Milwaukee, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (713 West Bruce Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 30 on 11/30/2007.

101. Makaelia Missouri was a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 2921 North 6th Street, Milwaukee, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2921 North 6th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 26 on 8/26/1998.

102. Marsheree Missouri was a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 2921 North 6th Street, Milwaukee, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2921 North 6th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 11 on 9/15/1999.

103. Chante Mitchell was a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 2428 West Burleigh, Milwaukee, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (1030 South 12th Street, 2472 North 51st Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 44 on 11/5/1998.

104. Marquise Mitchell was a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 2428 West Burleigh, Milwaukee, WI. Plaintiff is a citizen of the State of

Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (1030 South 12th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 37 on 2/11/1999.

105. Jyaire Murphy is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 5120 West Center Street, Apt. 1, Milwaukee, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (3940 West Lisbon Ave, 1753 North 32nd Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 23 on 8/11/2005.

106. Demond'dre Myers is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 10818 West Cameron, Milwaukee WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2507 North 9th Street, 2505 North 9th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted,

supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 26 on 8/9/2005.

107. Christopher Nash was a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 3361 North 22nd Street, Milwaukee, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (1536 North 35th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 23 on 2/21/1994.

108. Marteasha Newson was a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 3658 North 20th Street, Milwaukee, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (3221 North 14th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning

caused a peak elevated blood lead level of 33 on 7/16/1996.

109. Denver Nitsch was a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 806 West Howard Avenue, Milwaukee WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (9418 North Green Bay Road), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 29 on 8/26/1999.

110. Keith Norrington was a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 6124 West Spencer Place, Milwaukee WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin(2533 North 38th Street, Upper Apt., 2119 North 44th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 50 on 8/11/1993.

111. Benita Oatis was a minor and was a resident of the State of Wisconsin at all times material

to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 2269 South 16th Street, Milwaukee, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2112 North 36th Street, 2316 North Hubbard Street, 2430 North 32nd Street, 6236 West Kaul Ave), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 25 on 10/2/1992.

112. Titus Owens was a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 3010 N 22nd Street, Milwaukee, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2861 North 24th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 43 on 4/6/2001.

113. Sieana Pleester is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 1914 South 6th Street, Milwaukee, WI. Plaintiff is a citizen of the State of

Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (1914 South 6th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 26 on Sep-03.

114. Kathleen Rimmer was a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 2647 North 17th Street, Milwaukee, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2647 North 17th Street, 2628 North 9th Street #A, 2864, North 11th Lane) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 14 on 8/21/2001.

115. Khadedra Rimmer was a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 2647 North 17th Street, Milwaukee, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2647 North 17th Street, 2628 North 9th Street #A, 2864, North 11th Lane), which contained surfaces which

were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 32 on 8/3/1999.

116. Sharod Rimmer was a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 2172 North 46th Street, Milwaukee WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2726 West Clarke Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 39 on 8/3/1995.

117. Shyrelle Rimmer was a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 2647 North 17th Street, Milwaukee, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2647 North 17th Street, 2628 North 9th Street #A, 2864, North 11th Lane), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At

the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 27 on 9/28/2000.

118. Tieanna Rimmer was a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 2647 North 17th Street, Milwaukee, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2647 North 17th Street, 2628 North 9th Street #A, 2864, North 11th Lane), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 32 on 9/28/00 & 8/21/01.

119. Martez Rodgers was a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 3658 North 20th Street, Milwaukee, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2703 West Clarke Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to

be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 34 on or about 10/12/98.

120. Jacob Ruedinger is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 5838 West Scott Street, Milwaukee, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2934 South 15th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 27 on .

121. Jamara Ruffin is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 4407 West Clarke Street, Milwaukee, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (4407 West Clarke Street, 5810 West Fond Du Lac Avenue), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 28 on 8/10/2005.

122. Perrion Ruffin was a minor and was a resident of the State of Wisconsin at all times

material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 4934 North 73rd Street, Milwaukee, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (3357 North 20th St 3357 North 20th St), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 41 on 02/05/2003.

123. Tailyiah Rush is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 2823 North 44th Street, Milwaukee, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (1449 North 37th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 36 on 10/1/2009.

124. Cody Schwoch was a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 554 Poppy Lane, Altoona, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Eau Claire, Wisconsin (516 Dodge Street, Eau

Claire, WI), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 55 on Apr-93.

125. Marshia Scott was a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 3028 West Mt. Vernon Avenue, Milwaukee, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2427 West Juneau Avenue), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 48 on 9/18/1998.

126. Quincy Scott was a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 3028 West Mt. Vernon Avenue, Milwaukee, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2122 North 34th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the

Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 24 on 9/9/1995.

127. Santana Scott was a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was

domiciled at 2770 North 39th Street, Apt. A, Milwaukee, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (3504 West Sarnow Street, 2770 North 39th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 42 on 6/22/1999.

128. Taliyah Scott is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 2770 North 39th Street, Apt. A, Milwaukee, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2770 North 39th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning

caused a peak elevated blood lead level of 11 on 11/20/2003.

129. Tarayia Scott was a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 2770 North 39th Street, Apt. A, Milwaukee WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (3504 West Sarnow Street, 2770 North 39th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 29 on 6/22/1999.

130. Maurice Sloan, Jr. is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 3460 North 14th Street, Milwaukee, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (3350 North 14th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 48 on 10/7/2002.

131. Sammie Smith was a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011,

was domiciled at 2951 North 21st Street, Milwaukee, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (401/403 East Chambers Street, 2968 North Buffum Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 23 on 4/27/2001.

132. Shamar Smith is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 2951 North 21st Street, Milwaukee, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (1315 West Cherry Street, 2561 North 15th Street, 2951 North 21st Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 40 on 7/23/2003.

133. Sheliyah Smith was a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 2951 North 21st Street, Milwaukee, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (401/403

East Chambers Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 22 on 8/24/2000.

134. Sherelle Smith was a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 4613 West Marion Street, Unit 81, Milwaukee, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (1218 West Walnut Street, 2933 North 27th Street, 3203 West Senator Avenue, 804 South 21st Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 61 on 7/26/1996.

135. Shmyah Smith is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 2951 North 21st Street, Milwaukee, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (1315 West Cherry Street, 2561 North 15th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted,

supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 21 on 8/1/2005.

136. Sedan Smith was a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 4613 West Marion Street, Unit 81, Milwaukee, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (1218 West Walnut Street, 2933 North 27th Street, 3203 West Senator Avenue, 804 South 21st Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 40 on 3/10/1995.

137. Iyesha Southern was a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 1109 West Keefe Avenue, Milwaukee, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2477 North 44th Street, 2426 West Nash Street, Apt. C), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead

carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 13 on 7/28/05.

138. Brian Stewart is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 1109 West Keefe Avenue, Milwaukee, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2477 North 44th Street, 1109 West Keefe Avenue), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 35 on 7/30/2005.

139. Destiny Stokes was a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 1229 North 33rd Street, Milwaukee, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (3027 West Clybourne Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 36 on 9/29/1995.

140. Dawson Taylor is a minor and was a resident of the State of Wisconsin at all times material

to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 3417 North 4th Street, Milwaukee, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (3206 West Senator Avenue, 3417 North 4th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 32 on 6/18/2004.

141. Gerald Tennant III is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 223 Farnsworth Avenue, Oconto, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Gillett, Wisconsin (221 1/2 East First Street, Gillett, WI), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 52 on 11/24/2003.

142. Brian Thomas is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 2745 A North Richard Street, Milwaukee, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2745 A

North Richard Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 22 on 2/2/2006.

143. Camarion Thomas is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 2745 A North Richard Street, Milwaukee, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2745 A North Richard Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 38 on 12/23/2005.

144. Anthony Thompson was a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 4424 North 63rd Street, Milwaukee, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2539 North Holton Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the

Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 36 on 10/9/1997.

145. D'Angelo Shayqwan Thompson was a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 6543 North 73rd Street, Milwaukee, WI, and on January 19, 2011, was domiciled at 3703 North 20th Street, Milwaukee, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (3703 North 20th St, 3818 North 25th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 38 on 12/2/1999.

146. Destiny Thompson was a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 2954 North 19th Street, Milwaukee, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (1900 West Chambers Street, 2954 North 19th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead

poisoning caused a peak elevated blood lead level of 21 on 1/15/2003.

147. Synegeon Turner was a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 2418 A West Keefe, Milwaukee, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2111 North 27th St), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 43 on 2/14/1994.

148. Teriontae Walker is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 5379A North 84th St., Milwaukee, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2316 West Galena Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 27 on 8/20/2002.

149. Tina Weatherspoon was a minor and was a resident of the State of Wisconsin at all times

material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 2958 #A North 18th Street, Milwaukee, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2958A North 18th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 33 on 7/17/1992.

150. Daniel Wheless was a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 712 24th Avenue East, Superior, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Superior, Wisconsin (712 East 24th Avenue, Superior, WI), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 25 on 4/3/2002.

151. Randall Whitmore was a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 2606 North 18th Street, Milwaukee, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2113 West

Center Street, 2550 North 22nd Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 17 on 12/12/2001.

152. Sinquasha Whitmore was a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 2606 North 18th Street, Milwaukee, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2113 West Center Street, 2550 North 22nd Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 16 on 5/29/2001.

153. Jerrell Williams was a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 1921 West Keefe Avenue, Milwaukee, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (1921 West Keefe Avenue, #A), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the

Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 30 on 11/15/2002.

154. Jim-Mya Williams was a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 2925 North 26th Street, Milwaukee, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2321 N 41st Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 26 on 6/13/2000.

155. Makayla Williams is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 2925 North 26th Street, Milwaukee, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2925 North 26th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 22 on 12/7/2004.

156. Tyvoni Williams is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 2904 West Clark, Milwaukee, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2541 North 45th Street, 3353 North 22nd Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 22 on 7/23/2004.

157. Jaquaivia Willis was a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 5121 North 32nd Street, Milwaukee, WI. Plaintiff is a citizen of the State of Wisconsin. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (1934 North 49th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 53 on 7/16/1999.

158. Briana Zarate is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at, and on January 19, 2011, was domiciled at 1033 South 18th Street, Milwaukee, WI. Plaintiff is a citizen of the State of Wisconsin.

Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (1033 South 18th Street, 1550 South 7th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 45 on 7/9/2004.

159. American Cyanamid Company ("American Cyanamid") is being sued in its own capacity and is a Maine corporation with its principal place of business in New Jersey.

160. Armstrong Containers, Inc. ("Armstrong") is being sued in its capacity as the successor-in-interest to the John R. MacGregor Co. and the MacGregor Lead Company, and is a Delaware corporation with its principal place of business in Georgia.

161. E.I. DuPont DeNemours & Company ("DuPont") is a Delaware corporation with its principal place of business in Delaware.

162. The Atlantic Richfield Company ("ARCO"), the successor-in-interest to International Smelting and Refining Company, Anaconda Lead Products Company, Anaconda Sales Company, Anaconda Copper Mining Company, and International Lead Refining Company, is a Delaware corporation with its principal place of business in Illinois.

163. The Sherwin-Williams Company ("Sherwin-Williams") is an Ohio corporation with its principal place of business in Ohio.

164. At all pertinent times, American Cyanamid, Armstrong, DuPont, ARCO and Sherwin-Williams (hereafter referred to collectively as "Industry Defendants") together with their agents, servants, employees, alter egos, and predecessor corporations, manufactured, processed,

marketed, promoted, supplied, distributed and/or sold white lead carbonate pigments for use in residential paints and coatings in the State of Wisconsin, including the municipalities of Milwaukee, Gillett, Eau Claire, LaCrosse, Superior, Green Bay, and Racine, as well as the surrounding communities of each of those municipalities.

II. THE FACTS

165. The white lead carbonate pigment manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants was and is a defective and unreasonably dangerous product.

166. Specifically, the white lead carbonate manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants is unreasonably dangerous because the hidden risks of exposing children to white lead carbonate causes the childhood disease of lead poisoning, as well as additional severe and permanent injuries, including, but not limited to learning disabilities, decrements in intelligence, and deficits in a wide range of neuropsychological functioning, including visual motor skills, fine motor skills, verbal skills, attention and concentration, memory, comprehension and impulse control. Exposure of children to white lead carbonate can also cause coma, seizure and death.

167. All of the white lead carbonate residential paint pigments manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants were functionally interchangeable, physically indistinguishable, identically defective and unreasonably dangerous.

168. Each Plaintiff is unable to identify the specific manufacturer, supplier and/or distributor of the white lead carbonate pigments present in the residence in which he or she was exposed and in which he or she ingested said pigments. Each Plaintiff's inability to identify the manufacturer, supplier and/or distributor of the white lead carbonate pigment was not and is not the fault of said

Plaintiff.

169. The white lead carbonate pigments manufactured, promoted, and sold by the Industry Defendants were in a condition not contemplated by the ultimate consumer and were dangerous to an extent beyond that which was contemplated by the ordinary consumer.

170. Each Plaintiff ingested lead derived from all paint layers containing white lead carbonate pigments in each residence at which Plaintiff was exposed and said lead was ingested, inter alia, through direct ingestion of paint chips containing white lead carbonate pigments in multiple layers, direct gnawing, chewing and sucking on intact accessible surfaces such as window sills and wood work covered with multiple layers of paint containing white lead carbonate pigments, and chronic and cumulative ingestion of dust containing lead derived from multiple layers of paint containing white lead carbonate pigments. In each exposure residence all the layers of paint containing white lead carbonate pigments combined to create a unified and indivisible risk of harm.

171. Although the use of all leaded pigments was banned in the United States in 1978, white lead carbonate pigments are still present in and on many homes, schools, hospitals and other public and private buildings throughout the State of Wisconsin, including the premises at which each Plaintiff was exposed to and ingested lead derived from white lead carbonate pigments.

172. Each Industry Defendant knew and/or should have known since at least the early 1900's that white lead carbonate pigments are hazardous to human health, and in particular to children. For example, in an 1881 booklet entitled "Paints and Painting," Sherwin-Williams wrote:

"While it is true that carbonate of lead possesses some of the best elements of paint, it is also true that in other respects it is defective."

In another example, in its employee newsletter for the month of January 1900, Sherwin-Williams published the following statement:

"It is also familiarly known that white lead is a deadly cumulative poison, while zinc is innocuous. It is true, therefore, that any paint is poisonous in proportion to the percentage of lead contained in it."

In an additional example, in its employee newsletter for the month of May, 1915, Sherwin-Williams published the following statement:

"White lead . . . has some fatal defects, chief of which is the tendency to 'chalk' off after exposure for a year or two."

173. Each Industry Defendant also knew and/or should have known that, at all relevant times, there existed safer alternatives to the use of white lead carbonate as a pigment for residential paints and coatings.

174. In 1971, after decades of medical research had unambiguously implicated white lead carbonate pigments as the major contributing force in childhood lead poisoning, and at a time when the majority of paint and pigment manufacturers had ceased production of white lead carbonate, American Cyanamid entered the white lead carbonate pigment market.

175. Beginning on June 1, 1971, American Cyanamid began to manufacture white lead carbonate pigments specifically intending that said pigments be used by Armstrong Chemcon, Inc., in its Scotch Laddie line of exterior residential paints which consisted of 85% pure white lead carbonate and which was sold and distributed in the State of Wisconsin and the City of Milwaukee, as well as the cities of Racine, Green Bay, Eau Claire, LaCrosse, Gillett, and surrounding communities. The Scotch Laddie line of residential paints containing high concentrations of pure white lead carbonate pigments continued to be sold and advertised in Wisconsin through 1973.

176. Despite their knowledge that white lead carbonate pigment was unreasonably dangerous and hazardous to human health, each of the Industry Defendants continued to manufacture, process, market, promote, supply, distribute and/or sell white lead carbonate pigments, failed to warn of the hazardous nature of white lead carbonate pigment, and failed to adequately test white lead carbonate

pigments.

177. Each of the Industry Defendants also contributed to the creation of a risk of harm to children when it failed to disclose the hazardous nature of white lead carbonate pigments and instead marketed and represented its paint products containing white lead carbonate pigments as safe.

178. Specifically, the Industry Defendants engaged in promotional campaigns that failed to disclose the dangers of using white lead carbonate pigments in residential paints and coatings and of exposing children to paint and coatings products containing white lead carbonate. Further, the Industry Defendants marketed paints and coatings containing white lead carbonate pigments as products that fostered health and well-being and that could be used safely on interior and exterior surfaces where the presence of children was likely.

179. Despite the knowledge of each of the Industry Defendants regarding the hazards of white lead carbonate when used as a pigment in residential paint, each failed to disclose the dangers of using white lead carbonate pigments in residential paints and coatings and of exposing children to paint and coatings products containing white lead carbonate pigments.

180. Instead, for decades the Industry Defendants marketed white lead carbonate as a safe areas inhabited by children.

181. Each of the Industry Defendants also contributed to the creation of the risk of harm to the Plaintiff through participation in trade associations such as the Lead Industries Association (“LIA”) and the National Paint, Varnish, & Lacquer Association (NPVLA), and said activity included, inter alia, marketing white lead carbonate as a pigment in paint through misleading advertisements and promotions that failed to disclose the dangers of using white lead carbonate pigments in residential paints and coatings and of exposing children to paint and coatings products containing white lead carbonate pigments.

182. Furthermore, the Industry Defendants contemplated that the paint products they manufactured, including those containing white lead carbonate pigments might cause personal injuries for which they may be liable. For example, on January 28, 1936, the National Paint, Varnish and Lacquer Association, Inc. (NPVLA), advised various Industry Defendants, including Sherwin-Williams and E.I. DuPont, that:

“during the past few years many claims for bodily injury, illness or death have been brought against members of the paint industry from causes claimed to have arisen through the use of the products of the industry and advised that a type of insurance has been developed to protect members of the industry against this [h]azard.”

The NPVLA further advised that:

“the Scientific Section of the Association had been urging the adoption of caution tables for the past twenty years, the that the Association had received little cooperation from members of the industry in this particular filed.”

183. The LIA is not a party because it is presently under the protection of the bankruptcy laws in the United States. From at least 1928 through the events material to allegations of this product that fostered health and well-being and promoted white lead as a pigment for use in complaint, the LIA was the agent, servant, employee, alter ego, aider and abettor of one or more of the Industry Defendants and acted individually and/or within the scope of its agency, servitude and employment in promoting and marketing white lead carbonate products used as a pigment in paints and coatings for residential use in the State of Wisconsin during the relevant time period.

184. Through the LIA and NPVLA, each of the Industry Defendants also sought to suppress all unfavorable information and publicity about white lead carbonate pigments without regard for the truth of such information and despite its own contrary knowledge about the severe hazards posed by white lead carbonate when used as a pigment in paint.

185. As a result of the intentional, negligent and other wrongful conduct of the Industry

Defendants in manufacturing, processing, marketing, promoting, supplying, distributing and/or selling white lead carbonate residential paint pigments, said defective and unreasonably dangerous product was present in and on each of the residences at which each Plaintiff ingested lead derived from white lead carbonate pigments as alleged in the preceding paragraphs of this Complaint.

186. At all relevant times, the conduct of the Industry Defendants was malicious and in reckless and/or intentional disregard for the rights of the Plaintiff.

187. As a direct and proximate result of these and other wrongful actions by the Industry Defendants, each of the Plaintiffs has suffered the injury of lead poisoning, as well as, severe and permanent sequelae, including, but not limited to, great pain of body and mind and significant neuro-psychological deficits, past and future hospital and medical expenses, and impairment of each Plaintiff's ability to learn, live and enjoy life, all in an unspecified amount pursuant to Wisconsin Statutes.

FIRST CAUSE OF ACTION
Strict Liability of the Industry Defendants

188. The Plaintiffs re-allege and incorporate herein by reference the foregoing paragraphs of this Complaint.

189. The Industry Defendants have at all times material to this action been engaged in the business of manufacturing, promoting, selling, distributing, and/or supplying of white lead carbonate pigments which were used in the painting, staining, construction of, and the maintenance and remodeling of the residences at which each of the Plaintiff ingested white lead carbonate pigments.

190. The white lead carbonate pigments that each of the Plaintiffs were exposed to were in substantially the same condition as the pigments were in before leaving the control of each of the Industry Defendants.

191. At the time that the white lead carbonate pigments left the possession and control of the Industry Defendants, the pigments were a defective and unreasonably dangerous product because the Industry Defendants failed to provide an adequate warning, and when used in the manner in which the pigments were intended by the Industry Defendants and/or for the purpose that it was reasonably foreseeable that the pigments may have been used, the pigments caused substantial and severe injuries to each of the Plaintiffs.

192. The defective condition of the white lead carbonate manufactured, marketed, promoted, supplied, distributed and/or sold by Industry Defendants was a factor that substantially contributed to each of the Plaintiff's injuries.

SECOND CAUSE OF ACTION
Negligence of the Industry Defendants

193. The Plaintiff re-alleges and incorporates herein by reference the foregoing paragraphs of this Complaint.

194. The Industry Defendants knew and/or should have known that white lead carbonate when used as a pigment in residential paints and coatings was harmful to children coming into contact with it.

195. Despite the knowledge that white lead carbonate pigments posed an unreasonable risk to the health and welfare of children exposed thereto, the Industry Defendants continued to manufacture, promote, sell, distribute, and/or supply white lead carbonate pigments which were used in and on each of the residences at which each Plaintiff ingested lead derived from white lead carbonate pigments as alleged in the preceding paragraphs of this Complaint.

196. At all times material hereto, the Industry Defendants were under an obligation of due care to refrain from any act which would cause foreseeable harm to others.

197. At all times material, the Industry Defendants were under a continuing duty to warn about the hazards and unreasonable dangers of their white lead carbonate pigment products.

198. The Industry Defendants also owed a heightened duty of care because their conduct directly impacted the health and welfare of children.

199. The Industry Defendants breached their duties by engaging in conduct that posed an unreasonable risk of harm, including, among other things:

- a. selling white lead carbonate pigments without an adequate warning to the general public, including but not limited to, consumers, ultimate users, retailers, wholesalers, third party paint manufacturers, and other intermediaries, of the dangerous characteristics thereof;
- b. continuing to fail to adequately warn the general public of the dangerous characteristics of white lead carbonate pigments following the sale of its product through the present time;
- c. failing to adequately test white lead carbonate for use in residential paints and coatings; and/or
- d. continuing to manufacture, promote, sell, distribute, and/or supply white lead carbonate pigments for use in residential paints and coatings when they knew, or in the exercise of ordinary care, should have known that white lead carbonate was harmful to children and other persons coming into contact with it.

200. The negligence of the Industry Defendants was a factor that substantially contributed to the lead poisoning and other injuries caused to each of the Plaintiffs by the ingestion of white lead carbonate.

WHEREFORE each of the Plaintiffs demands judgment against each Industry Defendant, jointly and severally, as follows:

1. For each of the Plaintiffs in an unspecified amount pursuant to Wisconsin Statutes,

including but not limited to compensatory;

2. For pre-judgment and post-judgment interest, together with the costs, disbursements of this action;
3. For any other remedy the court deems just and equitable under the circumstances.

EACH PLAINTIFF HEREBY DEMANDS A JURY TRIAL.

Dated: February 21, 2018

Respectfully submitted,

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